



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

EPA Region 5 Records Ctr.



313765

June 17, 2008

REPLY TO THE ATTENTION OF:

Mr. Jerry C. Winslow
Principal Environmental Engineer
Xcel Energy
414 Nicollet Mall (Ren. Sq. 8)
Minneapolis, Minnesota 55401

SR-6J

RE: Comments on Groundwater Sampling Plan
Ashland/NSP Lakefront Superfund Site, Ashland, Wisconsin

Dear Mr. Winslow:

The United States Environmental Protection Agency (EPA) reviewed the Draft Groundwater Sampling Plan sent via e-mail on May 16, 2008, by Northern States Power Company (NSPW), (d.b.a. Xcel Energy). The plan was prepared by URS. In accordance with the Administrative Order on Consent (AOC), CERCLA Docket No. V-W-04-C-764, Section X, Paragraph (d), the United States Environmental Protection Agency (EPA) is disapproving the draft Groundwater Sampling Plan. However, Northern States Power Company (NSPW), (d.b.a. Xcel Energy) has 21 days to modify the submission based on our comments provided below. Please submit the revised document by July 8, 2008.

General Comments

1. The groundwater sampling plan needs to be revised in include a figure that shows all well locations.
2. The groundwater sampling plan contains numerous references to standard operating procedure (SOP) 190, which discusses decontamination procedures. This SOP is not included. SOP 190 needs to be included.
3. The sampling schedule needs to be changed to allow one sample round in August 2008, and one round 6 months later and then annually following that. The laboratory "turn around" on the first sampling event needs to be expedited. This will allow review and the possible use of the first round sample results in the remedy selection process.

Specific Comments

1. **Section 2.2, Page 4:** The text states that groundwater from seven monitoring wells screened in Kreher Park will be sampled. Kreher Park is not the name of a geologic formation, so this must be a typographic error. The text needs to be revised to provide

the correct and appropriate information for the geologic formation in which the wells are screened.

2. **Section 2.2:** A list of parameters needs to be provided for each fraction (for example, volatile organic compounds [VOC], semi-volatile organic compounds [SVOC], etc...).
3. **Section 2.3:** The text in this section needs to be revised to state that sampling of site-wide groundwater will be necessary during the construction and operation and maintenance (O&M) phases. In addition, the text needs to explain why only Copper Falls wells will be annually sampled. Finally, the text needs to be revised to state that all wells will be checked for non-aqueous phase liquids (NAPL) during each annual sampling event.
4. **Section 2.4:** The text needs to be revised to state that a low-flow sampling bladder pump will be used because all other sampling methods result in loss of VOCs. Also, the text needs to state that all wells will be annually checked for NAPL. In addition, parameter readings need to be collected at intervals of no less than 5 minutes. The 2-minute interval suggested for parameter readings in the text appears to be too short.
5. **Section 2.4.1:** See Specific Comment 4 above. If low-flow sampling were conducted, there would be no need for filtering.
6. **Table 1:** The table needs to be revised to list the collection of a total of six field duplicates and a total of three matrix spike/matrix spike duplicate (MS/MSD) samples. These numbers are based on quality assurance/quality control (QA/QC) sampling frequency requirements. In addition, SOP 180, Section 5.5, indicates that one MS/MSD sample collected for every 20 investigation samples. Therefore, Table 1 needs to be revised to indicate that 58 samples will require the collection of three MS/MSD samples.
7. **SOP 100, Section 8.0:** Groundwater elevation measurements using a popper is appropriate ONLY if light non-aqueous phase liquid (LNAPL), not NAPL, is present because dense non-aqueous phase liquids (DNAPL) will not interfere with groundwater elevation measurements. The text need to be revised appropriately.
8. **SOP 110, Section 2.0:** The text discusses pH readings only. The section needs to be revised to discuss all field parameter readings.
9. **SOP 150:** This SOP discusses bailer and submersible pump use and lists a whale pump as the only submersible pump. This pump type is not a standard pump for sampling. Instead, it typically is used to purge wells during development when volume requirements are more important than water quality requirements. The whale pump uses a crude impeller to move water up through the attached tubing, creating substantial turbulence and loss of volatile compounds. The recommended sampling pump is a bladder pump. The text needs to be revised to discuss a low-flow sampling method using a bladder pump. In addition, this SOP discusses procedures for using a bailer only. Either the SOP needs to be revised to include a discussion of procedures specific to both a

bladder pump and bailer, or an additional SOP for sampling using a bladder pump need to be included.

10. **SOP 160, Section 2.0:** The text needs to be revised in include metals as inorganic compounds.
11. **SOP 160, Section 3.0:** The sampling equipment list should be revised to include bladder pumps.
12. **SOP 160, Section 4.1, Bullet 6:** The text states that samples for SVOC analysis will be collected in plastic bottles. The appropriate sample bottles for SVOC analysis is amber glass bottles and not plastic bottles. Use of plastic bottles could introduce plasticizers in the sample.
13. **SOP 160, Section 4.2:** This section pertains to soil and sediment sampling. However, this section should be removed because soil and sediment sampling is not planned.
14. **SOP 170:** This SOP does not address the potential for clogged filters. The text needs to be revised to discuss procedures in case a filter is clogged to the point where a pump cannot push water through the filter.
15. **SOP 180, Section 3.0:** The groundwater sampling plan indicates that a double volume will be collected for MS/MSD samples. However, this section indicates that a triple volume will be collected for MS/MSD samples. The groundwater sampling plan and this section of the SOP need to be revised, as needed, to resolve the discrepancy.
16. **SOP 180, General Comment:** This SOP includes techniques and procedures for soil sampling (for example, collection of steam cleaner water field blanks, presumably from drilling operations) that are not part of the groundwater sampling plan. All references to soil sampling needs to be removed.
17. **SOP 180, Section 5.4:** This section discusses duplicates and states that “samples are split as described above in other SOPs...” However, the text “above” does not discuss how samples are to be split, and the reader should not be referred to other SOPs. The text needs to be revised to describe how sample duplicates will be collected.
18. **SOP 180, Section 5.4:** The text does not define “Levels C, D, and E Analyses.” The text needs to be revised to define these levels of analysis.
19. **SOP 270, Section 4.1, Bullet 4:** The text needs to be revised to state that the measurement of the depth to DNAPL will be recorded in the field logbook.
20. **SOP 270, Section 4.2:** It is unclear why the bailer should NOT be lowered below the “fluid layer.” First, the text does not indicate what the “fluid layer” is. Presumably, this layer refers to LNAPL, but if so, it is not clear how it is possible to tell when the bailer is out of the “fluid layer.” Also, it is unclear how it is possible to determine the LNAPL

thickness is the bailer does not pass through the entire LNAPL thickness. The text needs to be revised, as needed, to clarify these issues.

If you have any questions or would like to discuss things further, please contact me at 312-886-1999.

Sincerely,

Scott K. Hansen
Remedial Project Manager

cc: Dave Trainor, Newfields
Jamie Dunn, WDNR
Omprakash Patel, Weston Solutions, Inc.
Henry Nehls-Lowe, DHFS
Ervin Soulier, Bad River Band of the Lake Superior Chippewa
Melonee Montano, Red Cliffe Band of the Lake Superior Chippewa